

**UNITED STATES OF AMERICA
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

Plaintiff,

NO. CR 05-30023-MAP

v.

WALTER T. MAY

Defendant.

_____/

Mitchell H. Nelson (P22825)
IMHOFF & ASSOCIATES, PC
398 Kent Way
White Lake, MI 48383
(248) 461-6777

_____/

**MOTION TO MODIFY TERMS AND CONDITIONS OF
DEFENDANTS RELEASE**

Now comes the Defendant, Walter May, in the above-entitled matter and respectfully requests that this Honorable Court allow him to modify his terms of release to allow him to go to four 2-hour appointments with Verena J. Smith, Lic. Ac. Dipl. Ac. , 19 Cosby Ave., Amherst, MA 01002. The first appointment is scheduled for Friday, March 23, 2007, the second for March 30, 2007, the third for April 6, 2007, and the fourth for April 13, 2007 all at 11:15. The Defendant plans to leave his house at 10:00 a.m. and expects that he will be back home at 2:15 a.m.

Further, the Defendant, Walter May requests permission to attend the scheduled Pretrial Conference on Thursday, March 15, 2007 at 2:30 pm. The

Defendant plans to leave his house at 1:45 p.m. and arrive back at his home forty-five (45) minutes after the hearing ends.

Dated: March 8, 2007

IMHOFF & ASSOCIATES, PC.

BY: /s/ Mitchell H. Nelson

Mitchell H. Nelson (P22825)
398 Kent Way
White Lake, MI 48383
248-461-6777

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent to Todd Newhouse, AUSA on this 8th day of March, 2007

/s/ Mitchell H. Nelson

Verena Johanna Smith Reg. Ac. Dipl Ac., CH (NCCAOM)
Practitioner of Oriental Medicine
19 Cosby Ave. Amherst, MA 01002
Tel: 413-549-2830 FAX: 413-549-4494 verena@unifitofhealth.com

To whom it may concern:

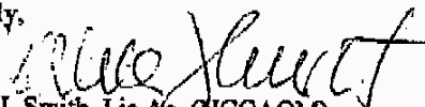
February 12, 2007

Walter May is a patient of Verena J. Smith, Lic.Ac. He is being treated for trigeminal neuralgia which is causing him significant pain. Since he began treatments in this office, Mr. May has seen considerable improvement. Each treatment has delivered a positive shift in the intensity of pain. He used to not be able to hold a conversation or accomplish any physical or intellectual task because of the relentless nature of the piercing pain he had to endure.

Progressively, over the last several weeks, Mr. May has seen a considerable improvement. He has come for weekly treatments, and now demonstrates impressive changes.

I still recommend another 12 treatments over three months with a re-evaluation at that time. I trust that we can eliminate the entire inflammatory activity in the Trigeminus.

Sincerely,


Verena J. Smith, Lic.Ac. (NCCAOM)